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FEDERAL COMMUNICATIONS COMMISSION
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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of

Carriage of the Transmission)
of Digital Television Broadcast Stations) CS Docket No. 98-120
Amendments to Part 76)
of the Commission's Rules)

To: The Commission

COMMENTS OF CHRIS-CRAFT/UNITED GROUP

The Chris-Craft/United Group of television broadcast stations hereby submits the following comments in response to the July 10, 1998, Notice Of Proposed Rule Making in this proceeding.

The Chris-Craft/United Group is comprised of the nine television stations owned and operated by Chris-Craft Industries, Inc., and its controlled subsidiaries BHC Communications, Inc.¹ and United Television, Inc. These stations are WWOR-TV, Channel 9 (UPN), Secaucus, New Jersey (New York City market); KCOP(TV), Channel 13 (UPN), Los Angeles, California; KBHK-TV, Channel 44 (UPN), San Francisco, California; KPTV, Channel 12 (UPN), Portland, Oregon; KMOL-TV, Channel 4 (NBC), San Antonio, Texas; KTVX(TV), Channel 4 (ABC), Salt Lake City, Utah; KMSP-TV, Channel 9 (UPN),

¹ BHC Communications, Inc., through other subsidiaries, owns 50% of the United Paramount Network.

Minneapolis, Minnesota; KUTP(TV), Channel 45 (UPN), Phoenix, Arizona; and WUTB(TV), Channel 24 (UPN), Baltimore, Maryland.

At the outset, Chris-Craft/United Group wishes again to stress, as it has in earlier comments in the Commission's generic DTV rule making proceedings, that it is a strong supporter of the conversion of broadcast television to digital channels and wants the process to move forward as quickly as possible. If free, over-the-air television is to survive as a universal service -- and nothing less would serve the public interest -- it must be allowed to be competitive and to offer a universally accepted and universally received system of digital broadcasting. All viewers need to have access to broadcast DTV.

To that end, even though none of its stations is required under the Commission's rules to inaugurate digital broadcasting before 2001, Chris-Craft/United Group's current intentions are to have all of its digital stations on the air by the end of 1999. The group has not finally settled on a transmission format, and intends to look at and perhaps experiment with several alternatives.

Chris-Craft/United Group's nine stations are at various stages of development with regard to commencing digital broadcasting depending on a variety of factors, the most significant of which involve antenna site availability and structural tower analysis. The most advanced progress toward initiation of DTV service exists with the groups stations in the top-10 markets. Equipment has been ordered for KCOP-TV in Los Angeles and KBHK-TV in San Francisco, with delivery expected this month. Applications for digital service have been

filed by both stations with the FCC, and if those applications are promptly granted (as we expect), and if construction schedules are met, the stations should begin digital broadcasting by the end of this year. Initiation of DTV service by WWOR-TV in the New York market is taking longer because of the widely-recognized difficulties with New York City antenna siting.

These actions confirm and demonstrate the commitment of Chris-Craft/United Group to the prompt introduction of over-the-air digital broadcasting. The group has responded to the Commission's encouragement of rapid DTV deployment by putting its money where its mouth is, so to speak, in anticipation of, among other things, reasonable and adequate digital must carry requirements. It has done so even though the economic prospects for digital broadcasting are far from certain, and the interest of the public in purchasing digital television sets yet to be tested in the real world. In such an uncertain environment it is important that, in this proceeding, the Commission carefully consider the role and effect of potential digital must carry regulation on consumer acceptance of digital television and the success, in particular, of the roll-out of over-the-air digital broadcast television.

Chris-Craft/United Group recognizes that, in adopting rules to implement digital must carry, the Commission may have to weigh and balance a variety of factors. In doing so, Chris-Craft/United urges the Commission to give great weight to several critical points. First, if public acceptance of digital television, and inauguration and expansion of digital broadcasting, are to be

encouraged, those who purchase digital sets need to be able to receive and watch digital broadcast stations in their market. Second, cable television systems may have an anticompetitive economic interest in not carrying digital broadcast stations or in forcing broadcasters to adopt technical standards and transmission modes best suited to serve the interests of the cable industry rather than the viewing public as a whole, which is why the marketplace generally is an inadequate solution to carriage issues. At a minimum, digital must carry requirements will be helpful in the transition from analog to digital television, the public benefits of which have been the basis of so much recent Commission regulation. Third, any must carry rules that are adopted, including any interim rules to cover the transition period, should not and must not advantage affiliates of the four established networks to the disadvantage of the newer networks and their affiliates.

CONCLUSION

Chris-Craft/United Group is committed to the prompt implementation of digital broadcasting. We urge the Commission to adopt

regulations in this proceeding so that broadcasters can effectively bring to their viewers the benefits of the digital age.

Respectfully submitted,

CHRIS-CRAFT/UNITED GROUP

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